LAW OFFICES OF

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MEMBER: N.Y. & N.J. BAR

February 23, 2021

**MEMO ENDORSED** 

Honorable Laura T. Swain United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Constantinescu, et al., 19-Cr-651 (LTS)

Adjournment of Scheduled March 8, 2021 Status Conference for David Georgescu (Defendant #25)

Dear Judge Swain:

On behalf of defendant David Georgescu and with the Government's consent, we respectfully move the Court for a 30-day adjournment of the status conference that is currently scheduled for March 8, 2021 at 9:00 am. The parties are actively engaged in plea negotiations. The defense consents to the exclusion of time from speedy trial calculations pursuant to 18 U.S.C. § 3161(h)(7)(A) for the purpose of continued plea negotiations until the next status date set by the Court.

Respectfully submitted,

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Donna R. Newman

Cc: All counsel of record via ECF

The application is granted. The conference is adjourned to April 9, 2021, at 12:00 p.m. The Court finds pursuant to 18 U.S.C. §3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through April 9, 2021, outweigh the best interests of the public and the defendants in a speedy trial for the reasons stated above. DE # 504 resolved.

SO ORDERED. Dated: 2/23/2021

/s/Laura Taylor Swain, USDJ